

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CARLA CAIN,	:
	:
	:
Plaintiff,	:
	:
	:
v.	:
	:
CINDY BASS, a Member of Philadelphia City	CIVIL ACTION
Council, in her personal capacity only,	No. 2:22-cv-00360
	:
and	:
	:
CITY OF PHILADELPHIA,	:
	:
Defendants.	:
	:

**STIPULATION FOR A PROPOSED SCHEDULING ORDER
ON THE MOTION FOR PRELIMINARY INJUNCTION**

The parties met and conferred on May 27, 2022 pursuant to this Court's May 19, 2022 Order, and have agreed on the following proposed schedule leading to a hearing on plaintiff's motion for preliminary injunction:

Friday, June 3, 2022	Plaintiff to provide substance of proposed testimony of witnesses identified for preliminary injunction hearing
Friday, June 10, 2022	Defendants to provide identification of witnesses and substance of proposed testimony for preliminary injunction hearing
Friday, June 10, 2022	Deadline to serve written discovery requests
Friday, June 24, 2022	Deadline to respond to written discovery requests
Monday, July 19-Friday, July 29, 2022	Depositions of preliminary injunction witnesses

Friday, July 29, 2022	Close of discovery
Friday, August 12, 2022	Plaintiff's memorandum in support of motion for preliminary injunction
Friday, August 26, 2022	Defendants' memoranda in opposition to motion for preliminary injunction
Hearing on motion for preliminary injunction	Week of September 19, 2022 (the parties estimate that the hearing will require two days of testimony)

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Dated: June 2, 2022